

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

EUGENIE BOUCHARD	)	Docket No. 1:15-cv-5920
	)	
Plaintiff,	)	
v.	)	
	)	
UNITED STATES TENNIS ASSOCIATION, INC. and USTA NATIONAL TENNIS CENTER, INC.	)	
	)	
Defendants.	)	
	)	

CONSENT MOTION FOR CONFIDENTIALITY AGREEMENT AND  
PROTECTED ORDER

Pursuant to the Court's directive of December 11, 2015, Plaintiff, Eugenie Bouchard ("Plaintiff"), and Defendants, United States Tennis Association Incorporated and USTA National Tennis Center Incorporated incorrectly named herein as "United States Tennis Association, Inc. and USTA National Tennis Center, Inc.", (hereinafter "Defendants"), jointly file this Consent Motion for the Entry of a Confidentiality Agreement and Protective Order and, in support thereof, would show the Court as follows:

Plaintiff and Defendants (the "Parties") agree that this matter is of such a nature that it would be in the best interests of the Parties to protect and ensure the confidential and/or proprietary nature of documents and information which they expect to exchange during discovery and/or motion practice herein. The Parties have therefore agreed to a form of Confidentiality Agreement and Protective Order, which is annexed hereto as Exhibit "A", to govern the exchange of potentially confidential and/or proprietary documents and information during discovery and/or motion practice herein. Accordingly, the Parties respectfully request that this Court enter the attached Confidentiality Agreement and Protective Order governing the

production, use, and disclosure of confidential and/or proprietary documents and information in this action.

**WHEREFORE**, the Parties respectfully request that this Motion be granted in all respects, consistent with the proposed Confidentiality Agreement and Protective Order submitted herewith.

Dated: White Plains, New York  
December 22, 2015

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